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ATTORNEY FOR DEFENDANT

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE No. 3:20-CR-00207-BR-01
Plaintiff,	)	
	)	DECLARATION IN SUPPORT OF
vs.	)	MOTION TO SUBSTITUTE AS COUNSEL
	)	FOR THE DEFENDANT
SHANT SINGH AHUJA,	)	
Defendant.	)	
	)	

MARK C. COGAN hereby makes the following declaration in support of the above-captioned motion:

1. I, along with Jeffrey A. Turnoy, am the attorney newly retained to represent the Defendant herein, and I make this Declaration in support of the Defendant's Motion to Substitute as Counsel for the Defendant. This declaration is based on a review of the court papers and upon information and belief, the sources of which include conversations with my client and others.

2. To this point, the Defendant has been represented by Susan Russell. I have informed Ms. Russell of the fact that I have been retained to take over representation of the Defendant.

3. The undersigned has served the U.S. Attorney's Office and Ms. Russell with a copy of same.

DECLARATION IN SUPPORT OF MOTION TO SUBSTITUTE AS COUNSEL FOR THE  
DEFENDANT

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4. For the foregoing reasons, we respectfully request that the Court issue an order allowing the undersigned to serve as counsel for the Defendant herein.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand they are being made for use as evidence in court and are subject to penalty for perjury, in accordance with ORCP 1E.

DATED:       Portland, Oregon  
              July 21, 2020

/s/ Mark C. Cogan  
Mark C. Cogan, P.C., OSB #920167  
Attorney for Defendant  
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